

AMENDMENTS TO THE DRAWINGS

Applicant is submitting herewith (2) sheets of replacement drawings, which include FIGS. 2b, 6a and 6b. The submitted drawings are intended to replace FIGS. 2b, 6a and 6b, which were originally filed on April 27, 2005, and are believed to obviate the Examiner's objections to the drawing figures since each of FIGS. 2b, 6a and 6b have been labeled as "RELATED ART."

Attachment: Two Replacement Sheets (FIGS. 2b, 6a and 6b).

REMARKS

I. Formalities

Applicant thanks the Examiner for acknowledging the claim for priority under 35 U.S.C. § 119, and confirming receipt of the certified copy of the priority document that was submitted on April 27, 2005.

Applicant also thanks the Examiner for considering the references cited with the Information Disclosure Statement filed on April 27, 2005.

II. Status of the Application

By the present amendment, Applicant amends claims 1 and 7. Applicant also adds new claim 20 to more fully cover various implementations of the invention. Further, Applicant hereby cancels claim 6 without prejudice or disclaimer. Claims 1-6 and 7-20 are all the claims pending in the Application. Claims 1-10 and 12-19 have been rejected and claim 11 has been objected to.

The present Amendment addresses each point of objection and rejection raised by the Examiner. Favorable reconsideration is respectfully requested.

III. Allowable Subject Matter

Applicant thanks the Examiner for indicating that claim 11 would be allowed if rewritten in independent form. Accordingly, Applicant hereby adds new claim 20, which corresponds to claim 11 rewritten in independent form. Thus, Applicant respectfully submits that claim 20 is immediately allowable.

IV. Objections to the Drawings

The Examiner has objected to Figures 2b, 6a, and 6b for various informalities. In particular, the Examiner alleges that Figures 2, 6a, and 6b should be designated by a legend such as --Prior Art--.

Applicant has submitted two replacement drawing sheet including Figures 2b, 6a and 6b in which Figures 2, 6a, and 6b have been labeled as "RELATED ART." Thus, Applicant respectfully requests that the Examiner withdraw these objections.

V. Claim Rejections - 35 U.S.C. § 102

Claims 1, 4-10 and 12 are rejected under §102(b) as allegedly being clearly anticipated by U.S. Patent No. 3,612,136 to Gough (hereinafter "Gough"). In addition, claims 1, 2, 4, 8, 10 and 12 are rejected under §102(b) as allegedly being clearly anticipated by U.S. Patent No. 3,881,492 to Mirtain (hereinafter "Mirtain"). Applicant respectfully traverses these rejections for *at least* the reasons set forth below.

As a preliminary matter, Applicant submits that all of the above rejections are improper because they do not provide any explanation regarding how the pending claims are anticipated by the cited references, as required by USPTO practice. In fact, the grounds of rejection do not provide any explanation whatsoever to support the sweeping allegations that the cited references disclose each and every element of the claims. Therefore, Applicant submits that the grounds of rejection are unsupported for *at least* these reasons.

Secondly, according to the MPEP, "a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art

reference.” (MPEP § 2131). Applicant respectfully submits that claim 1 positively recites limitations which are not disclosed (or suggested) by Gough.

For instance, without conceding the merits of the current rejections, independent claim 1 has been amended to include the recitations of previous dependent claim 6 and now recites (among other things):

...wherein an inner belt layer constituting an inner surface of the main belt has a larger belt angle than that of an outer belt layer constituting an outer surface of the main belt...

The grounds of rejection acknowledge that Mirtain fails to disclose or suggest the recitations of claim 6 and, instead, rely on Gough as allegedly disclosing the above feature. Applicant respectfully disagrees.

Gough merely discloses that in a second modification of the embodiments, the cords of the narrow breaker layers are inclined unequally. Column 3, lines 14-17. Gough also discloses that in a third modification of the embodiments, “the cords of the narrow breaker layers are inclined the radially narrow breaker layers 4a and 4b are inclined in the same or opposite sense and in either case the angular difference between the cords of each narrow breaker layer is substantially greater than 5° and may be as large as 60°.” (Column 3, lines 19-24).

However, contrary to the requirements of amended claim 1, Gough does not provide any disclosure or suggestion whatsoever regarding which of the breaker layers 4a and 4b has a larger belt angle. Indeed, the invention recited in claim 1 improves the cornering performance and the straight-running stability of a tire by making the belt angle of the inner belt layer larger than that

of the outer belt layer. As discussed in the present specification, for example, the inner belt layer is more responsible for the transversal rigidity of the main belt. *See e.g.*, paragraph 0037.

In contrast to claim 1, Gough makes no mention at all regarding the specific relationship between the belt angle of the inner belt layer and the belt angle of the outer belt layer. Quite to the contrary, Gough merely describes a relationship between the inclined cords of the narrow breaker layers, suggesting that the cords can be inclined in the same or opposite sense and that the angular difference between the cords of each narrow breaker layer is substantially greater than 5° and may be as large as 60°. However, Gough does not even remotely suggest the specific relationship between the belt angle of the inner belt layer and the belt angle of the outer belt layer, as claimed.

Accordingly, Applicant respectfully submits that independent claim 1 is not anticipated by (i.e. is not readable on) the applied Gough reference for *at least* these independent reasons. Further, Applicant respectfully submits that the dependent claims 1, 2, 4-10 and 12 are allowable *at least* by virtue of their dependency on claim 1. Thus, Applicant respectfully requests that the Examiner withdraw these rejections.

V. Claim Rejections - 35 U.S.C. § 103

Claims 2, 3, 13-16 and 19 are rejected under §103(a) as allegedly being unpatentable over Gough. Claims 3, 13-16 and 19 are rejected under §103(a) as allegedly being unpatentable over Mirtain. Finally, claims 17 and 18 are rejected under §103(a) as allegedly being unpatentable over Gough in view of U.S. Patent No. 6,260,596 to Ubukata (hereinafter “Ubukata”) or,

alternatively, Mirtain in view of Ubukata. Applicant respectfully traverses these rejections for *at least* the reasons set forth below.

Claims 2-3 and 13-19 incorporate all the novel and non-obvious recitations of their base claim 1. For *at least* the reasons already discussed above, neither Gough nor Mirtain disclose or suggest all the recitations of claim 1. Moreover, Ubukata fails to remedy the deficient teachings of Gough and Mirtain. Therefore, Applicant respectfully submits that the dependent claims 2-3 and 13-19 are patentable over the cited references *at least* by virtue of their dependency on claim 1.

In addition, claim 16 recites (among other things):

...wherein at least one auxiliary belt is
provided on the outer surface of the main belt
over a region substantially covering the main
belt...

Neither Gough, Mirtain, nor any combination thereof, teaches or suggests the above feature. In fact, Gough teaches just the opposite—that the full width breaker layer 3 is disposed below the narrow breaker layers 4a and 4b. *See e.g.*, FIG. 1. What is more, Mirtain fails to remedy the deficient teachings of Gough in this regard.

Accordingly, Applicant submits that claim 16 is patentable over the cited references for *at least* these additional independent reasons and respectfully requests that the Examiner withdraw this rejection.

VI. Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.


Respectfully submitted,

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